

SEALED

ORIGINAL IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2023 FEB 22 PM 4:07

UNITED STATES OF AMERICA

v.

DONALD DERRELL SLAY, Jr. (1)
RICHARD DANIEL GOMEZ (2)

FILED UNDER SEAL

DEPUTY CLERK **MS**

****SEALED as to DONALD
DERRELL SLAY, Jr. (#1) ONLY**

Criminal No.

3 - 23 CR 0068 - X

SEALED INDICTMENT

The Grand Jury Charges:

Count One

Possession with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 841 and 841(b)(1)(C)(vi))

On or about January 26, 2023, in the Dallas Division of the Northern District of Texas, the defendants, **DONALD DERRELL SLAY, Jr.** and **RICHARD DANIEL GOMEZ**, did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide, also known as "fentanyl," a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C)(vi).

Count Two

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(C))

On or about January 26, 2023, in the Dallas Division of the Northern District of Texas and elsewhere, **DONALD DERRELL SLAY, Jr.** and **RICHARD DANIEL GOMEZ**, defendants herein and others both known and unknown, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with each other and with other persons both known and unknown, to commit certain offenses against the United States, to-wit: to possess with the intent to distribute and to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as “fentanyl,” a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C)(vi).

All in violation of 21 U.S.C. § 846.

Count Three

Possession with Intent to Distribute a Schedule II Controlled Substance
(Violation of 21 U.S.C. § 841(b)(1)(C))

On or about December 12, 2022, in the Dallas Division of the Northern District of Texas, the defendant, **DONALD DERRELL SLAY, Jr.** did intentionally and knowingly possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

FORFEITURE NOTICE
21 U.S.C. § 853(a) and 21 U.S.C. § 881(a)

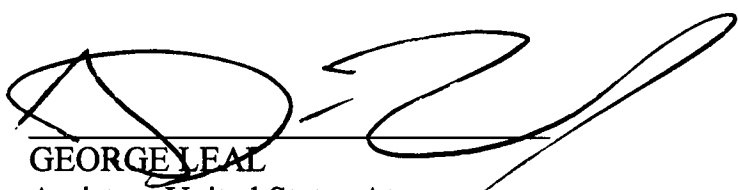
Upon conviction for any of the offenses alleged in Count One, Two, or Three of this Indictment and pursuant to 21 U.S.C. § 853(a) the defendants, **DONALD DERRELL SLAY, Jr.** and **RICHARD DANIEL GOMEZ**, shall forfeit to the United States of America any property constituting or derived from proceeds obtained, directly or indirectly, as a result of the respective offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the respective offense(s).

A TRUE BILL

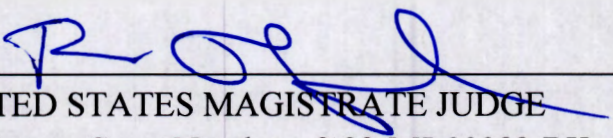


FOREPERSON

LEIGHA SIMONTON
UNITED STATES ATTORNEY



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UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 3:23-MJ-00083-BK

**as to Richard Daniel Gomez only

Magistrate Court Number: 3:23-MJ-00126-BH

** as to Donald Derrell Slay, Jr. only

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

DONALD DERRELL SLAY, Jr. (1)
RICHARD DANIEL GOMEZ (2)

SEALED INDICTMENT

21 U.S.C. § 841 and 841(b)(1)(C)(vi)
Possession with Intent to Distribute a Controlled Substance
(Count 1)

21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(C)
Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Count 2)

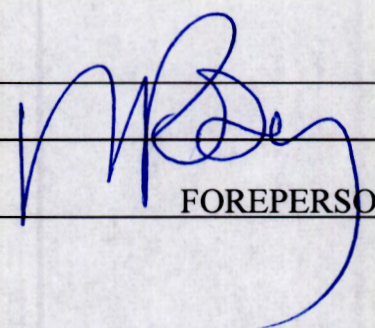
21 U.S.C. § 841(b)(1)(C)
Possession with Intent to Distribute a Schedule II Controlled Substance
(Count 3)

21 U.S.C. § 853(a) and 21 U.S.C. § 881(a)
Forfeiture Notice

3 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 22 day of February, 2023.

Warrant to be Issued for Donald Derrell Slay, Jr. (#1) only **

Richard Daniel Gomez (#2) currently on PT Release per order of 02/03/2023
